



November 29, 2017

The Honorable Ajit Pai  
Chairman  
Office of the Chairman  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: CC Docket No. 92-237 - *Joint Request of CenturyLink and T-Mobile for Voting Membership on the North American Numbering Council*

Dear Chairman Pai:

On November 14<sup>th</sup>, the Wireline Competition Bureau announced your designations of Members, Working Groups and Leadership of the North American Numbering Council (“NANC”).<sup>1</sup> CenturyLink and T-Mobile jointly applaud your efforts in designing a “new, invigorating NANC” to assist the Federal Communications Commission in developing numbering policies which advance competition and provide necessary oversight via the requirements of the Federal Advisory Committee Act (“FACA”). Pursuant to 47 C.F.R. § 1.106, we are writing to request that you reconsider the denial of nominations of Mr. Philip Linse and Ms. Michele K. Thomas, as representatives of our respective companies, to serve on the NANC.

CenturyLink and T-Mobile both agree that “[n]umbering issues are some of the most important issues currently facing the Commission.” Each of our companies has worked as a valuable member of the NANC for many years; as a standalone wireless and standalone wireline carrier, respectively, we each enhanced the balance of the NANC by representing the needs of wireless and wireline providers not mitigated by interests of other telecommunications sectors. Moreover, as entities with significant staff resources associated with numbering, we have been able to provide technical and operation expertise at a level that could not have been provided by trade associations in which we are members. Both companies led and engaged in important efforts undertaken by NANC Working Groups, including the Local Numbering Portability, the Future of Numbering, Billing and Collection, Numbering Oversight, and various Ad Hoc efforts. These efforts have produced numerous NANC recommendations to the Federal Communications Commission (“FCC”) and the ultimate adoption of federal numbering policies which have significantly benefitted consumers.

Through the nominations of Mr. Linse and Ms. Thomas, CenturyLink and T-Mobile each recently sought to renew our long-standing participation on the NANC so that we may continue and further build upon our efforts to support the FCC in its work on important pending and newly highlighted numbering matters. We were disappointed to learn that with the issuance of the November 14<sup>th</sup> Announcement that neither of our companies’ representatives was reappointed to serve as a Voting Member of the NANC. Because CenturyLink and T-Mobile maintain unique voices in the telecommunications marketplace as nationwide providers of only wireline and wireless service, respectively, our exclusion from the NANC reduces its balance. Both companies maintain telephone number resources across the country, and are heavy users of systems that support efficient number administration, proper routing/rating of calls and the porting of end user telephone numbers. Exclusive representation by our respective trade associations on the NANC cannot replicate the unique technical and operational experience and competitive needs of our companies vis-à-vis other industry participants as the NANC considers important changes to industry practices and technologies consistent with the FACA.

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<sup>1</sup> See, Federal Communications Commission Press Release “FCC Chairman Ajit Pai Announces Members, Working Groups, And Leadership For The North American Numbering Council” dated November 14, 2017, <https://www.fcc.gov/document/charman-pai-announces-members-leadership-numbering-council> .

Accordingly, participation by our companies' representatives on the NANC has ensured resolution of issues through the synergy industry brings, technical and operational expertise, and day-to-day experiences that this Commission simply lacks.<sup>2</sup> In addition, including our respective companies have assisted the FCC in its long-standing effort to design the NANC in a manner which ensures the proper balance of membership to fulfill its advising purpose as required by the FACA. Notably, the FCC has underscored the need for the NANC to include "...a consultative assembly of knowledgeable persons for a specific purpose" and to "prevent industry perceptions that the NANC is biased, or that it fails to afford to all the opportunity to contribute and be heard with respect to the development of numbering policy."<sup>3</sup> Including our companies' representatives would further NANC's founding mission to provide "consensus advice from industry on numbering issues to enable [the Commission] to make timely, informed decisions on numbering policy issues."<sup>4</sup>

In reviewing the recent announced appointments, we note that the overwhelming majority of the Voting Membership on the NANC do not maintain an inventory of telephone numbers, use the systems that support number administration, port telephone numbers, nor contribute to the costs of the North American Numbering Plan. While those Members may provide certain insights on numbering policies, they are not directly impacted by the technical, operational or financial impacts of those potential advancements, and do not operate the operational infrastructure necessary to manage numbering resources. In fact, only eleven of the thirty-one NANC Voting Members represent the interest of telecommunications providers; and, none of them comes from our respective sectors as nationwide, stand-alone providers of wireline and wireless telecommunications respectively. As noted above, trade associations and non-users of the beforementioned systems do not and likely will not support the important needs and significant demands of the NANC Working Groups, which have historically produced *all* substantive recommendations to the NANC and the FCC. Adding one standalone nationwide wireless carrier and one standalone nationwide wireline carrier will enhance, rather than disrupt NANC's balance, and will not make NANC unwieldy as compared with its current membership.

For the reasons noted herein, CenturyLink and T-Mobile jointly request that you reconsider our representatives' nominations to be Voting Members of the NANC and further expand the membership to ensure that all pending numbering issues and future matters defined in the November 14<sup>th</sup> Announcement have the benefit of our respective companies' unique attributes in the marketplace and the contributions of our technical and operational expertise.

Respectfully submitted,



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<sup>2</sup> See *Admin. of the North American Numbering Plan*, 11 FCC Rcd. 2588, 2609 ¶ 45 (1995).

<sup>3</sup> *Id.* at ¶ 52.

<sup>4</sup> *Id.* at ¶ 45.